

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	<u>FILED UNDER SEAL</u>
	§	No. 3:12-CR-317-L
v.	§	No. 3:12-CR-413-L
	§	
BARRETT LANCASTER BROWN	§	

GOVERNMENT'S AGREED MOTION TO SEAL
THE PLEA AGREEMENT AND THE FACTUAL RESUMÉ

1. The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney, files this Agreed Motion to Seal the Plea Agreement¹ and the Factual Resumé. The parties agree that these documents should be filed under seal, due to the terms of the Agreed Protective Order² and pursuant to and in the spirit of the Court's September 4, 2013 Agreed Order Re: Extrajudicial Statements.³

Attached hereto are the Plea Agreement and the Factual Resumé.

2. The government anticipates filing an agreed motion to lift the Court's September 4, 2013 Agreed Order Re: Extrajudicial Statements prior to or at the time of the re-arraignment, and thereafter requesting that the documents filed under seal pursuant to such order be unsealed.

1 The Plea Agreement Supplement is routinely filed under seal, and therefore no motion is necessary.

2 The Agreed Protective Order is document number 66 in cause number 3:12-CR-317-L and document number 35 in cause number 3:12-CR-413-L.

3 The Court's September 4, 2013 Agreed Order Re: Extrajudicial Statements is document number 93 in cause number 3:12-CR-317-L and document number 55 in cause number 3:12-CR-413-L.

3. The government respectfully requests that this Honorable Court seal the Plea Agreement and the Factual Resumé.

Respectfully submitted,

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney
State of Texas Bar No. 09347450
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242
Tel: 214.659.8600 Fax: 214.767.2846
candina.heath@usdoj.gov

CERTIFICATE OF CONFERENCE

I hereby certify that on March 31, 2014, I consulted with Ahmed Ghappour regarding this motion, and he did not object to filing the motion under seal.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2014, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing (ECF) system of the court. The ECF system sent a "Notice of Electronic Filing" to Brown's attorneys of record Ahmed Ghappour, Charles Swift, and Marlo Cadeddu, who consented in writing to accept this Notice as service of this document by electronic means.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney